



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

11 MAR 2009

Superintendent Tom Bradley
Jefferson National Expedition Memorial
11 North 4th Street
St. Louis, MO 63102

Dear Superintendent Bradley:

RE: Review of Draft Environmental Impact Statement for the Jefferson National Expansion Memorial, General Management Plan, Implementation, St. Louis, MO

Regions 5 and 7 of the U.S. Environmental Protection Agency have reviewed the Draft Environmental Impact Statement for the Jefferson National Expansion Memorial GMP. Our review is provided pursuant to the National Environmental Policy Act 42 U.S.C. 4231, Council on Environmental Quality regulations 40 C.F.R. Parts 1500-1508, and Section 309 of the Clean Air Act. The DEIS was assigned the CEQ number 20090004.

The GMP/DEIS includes four alternatives and six management zones for use within the Memorial. There is a no action alternative and three action alternatives (3, 4, and 5). Alternative 2 was withdrawn from consideration. Alternative 3 is the preferred alternative. The preferred alternative, "Program Expansion," would capitalize on multiple opportunities to expand the visitor experience throughout the Memorial. To gain the widest breadth of ideas for expansion, a design competition would be initiated by the National Park Service in close coordination with partners.

Based on the fact that the design competition for the preferred alternative has not yet begun, and that the result of an implemented design may cause "moderate to major long-term adverse to beneficial impacts on transportation" (conclusion, page 4-30), the EPA has rated the DEIS for this project Environmental Concerns-2 (insufficient information). A copy of EPA's rating descriptions is provided as an enclosure to this letter.

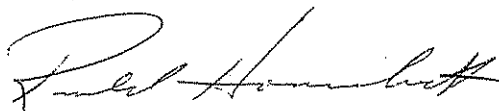
Overall, the document conveys a sense of thorough evaluation and wide encompassing coordination. Particularly noteworthy for use in comparative analysis of effects is Section 4.2, (Methods and Assumptions for Analyzing Impacts). We also commend the National Park Service for entering into an agreement with the St. Louis chapter of the National Audubon Society to turn off the lights that illuminate the Gateway arch during the Spring and Fall bird migration.

EPA offers a few observations and recommendations as follows:

1. Park land holdings contain considerable urban fill. Caution should be exercised when building new infrastructure with respect to asbestos, and wastes from previous activities undertaken on Memorial lands (e.g. W.H. Bull Medicine Factory).
2. Metropolitan and State transportation planners (East-West Gateway, Missouri Department of Transportation, Federal Transit Authority...) might assist in influencing the design competition specifications to preclude designs that are likely to result in an adverse effect.
3. The results of American Indian consultation with the Peoria Tribe, and others, should be completed and those results included in the Final EIS.
4. The FEIS should include any commitments on behalf of the NPS to adhere to E.O.13423, "Strengthening Federal Environmental, Energy, and Transportation Management," and/or Leadership in Energy and Environmental Design goals. We suggest informing design competition entrants about the sustainability commitments of the NPS at the beginning of the design competition.
5. In addition to the general air-quality mitigation measures listed on page 1-15, please also consider adding:
 - construction equipment and tour buses will be shut down when not in use,
 - how anti-idling measures will be enforced, and
 - retrofitting all diesel powered construction equipment with diesel oxidation catalysts or diesel particulate filters.
6. The following typographical errors:
 - Page 1-13, Environmental Justice Section, 2nd paragraph, 2nd sentence needs clarification.
 - Page 4-13, Sections 4.3 and 4.4, the letters "e" and "n" are substituted for each other in the titles of those sections.

Thank you for the opportunity to provide comments regarding this project and your DEIS. If you have any questions or concerns, please contact Joseph Cothorn at (913) 551-7148.

Sincerely,

A handwritten signature in dark ink, appearing to read "Ronald F. Hammerschmidt". The signature is fluid and cursive, with a large initial "R" and a long horizontal stroke extending to the right.

Ronald F. Hammerschmidt, Ph.D.
Director
Environmental Services Division

cc: Julie Guenther, U.S. EPA, Region 5, Chicago, IL
Nick Chevance, NPS, Omaha, NE

Draft Environmental Impact Statement Rating Definitions

Environmental Impact of the Action

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.